EQUITY—INJUNCTION TO PREVENT RECURRING TRESPASSES.—An owner of cattle, pigs, ducks, etc., permitted them to roam at large so that they repeatedly wandered over plaintiff's property and disfigured it. *Held,* an injunction would lie to restrain the repeated trespass. *Barnes* v. *Hagar et al.* (1914), 148 N. Y. Supp. 395.

This case, at least on its facts, is a good example of the modern tendency to grant injunction to restrain repeated trespasses on the ground of avoiding multiplicity of suits, without regard to other equitable considerations. Other late cases illustrating the same doctrine are: *Hounshell* v. *Miller,* 153 Ky. 530; *Kimple* v. *Schafer* (Ia.), 143 N. W. 505, dictum; *Bent* v. *Barnes,* (W. Va.), 78 S. E. 374; *O'Brien* v. *Murphy,* 189 Mass. 353; *Fuller* v. *Fisk,* 43 Pa. Super Ct. 489. On the other hand, a number of recent decisions adhere to the more conservative doctrine that, in order to warrant injunctive relief in such cases, there must be some further element involved, as that the damages inflicted would be irreparable, or the remedy at law inadequate because of the insolvency of defendant: *Randall* v. *Freed,* 154 Cal. 299; *Fletcher* v. *Pfeifer,* 103 Ark. 318; *Dixie Grain Co.* v. *Quinn,* (Ala.) 61 So. 886. Probably the weight of modern authority favors the granting of the injunction whenever the plaintiff, if refused his remedy in equity, would be driven to a multiplicity of vexatious actions for damages, on the ground that the remedy at law in such cases is not adequate.

EQUITY—INJUNCTION TO PREVENT UNLAWFUL BOYCOTT.—Plaintiff, a dealer in masons supplies, furnished such supplies to an employer of non-union labor against the protest of defendant labor union; defendants thereupon placed his name on the black list and agreed not to work on any building where the materials were furnished by plaintiff. As a result contractors and owners withdrew their patronage from plaintiff who therefore sought an injunction. *Held,* that defendant's conduct constituted an unlawful boycott and would be enjoined. *Burnham* v. *Dowd,* (Mass. 1914), 104 N. E. 841.

The Court rests its decision on the case of *Pickett* v. *Walsh,* 192 Mass. 572, where it was held that members of a labor union employed by a contractor with whom they have no dispute, cannot lawfully strike against him for the mere reason that he is doing work and employing some of their fellows upon another building upon which non-union men are employed, not by him, but by the owner of the building, the reason being that it is an unlawful combination for an unjustifiable interference with another's business. Where the boycott by a labor union has been directed at a former employer with whom they had a dispute, the majority of the cases have held that such a proceeding is an illegal interference with the business of another and would be enjoined. *George Jonas Glass Co.* v. *Glass Blowers Ass'n,* 72 N. J. Eq. 653, 66 Atl. 953; *Loewe* v. *California Federation of Labor,* 139 Fed. 71; *My Maryland Lodge* v. *Adt,* 100 Md. 238, 59 Atl. 721; *Beck* v. *Railway Teamsters' Protective Ass'n,* 118 Mich. 497, 77 N. W. 13; *Martin* v. *McFall,* 65 N. J. Eq. 658; *Hey* v. *Wilson,* 232 Ill. 389; *Albro J. Newton Co.* v. *Ferry,* 106 N. Y. Supp. 949. There are a few decisions to the contrary. *J. F. Parkinson Co.* v. *Building Trades Council,* 154 Cal. 581, 98 Pac. 1027;